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Federal Communications Commission (FCC)
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In the matter of
Closed Captioning
Requirements for
Digital Television Receivers

ET Docket No. 99-254

Comments of
Charles C. Estes, a private individual

November 2, 1999

My name is Charles C. Estes. I am totally deaf and completely dependent upon closed captioning to follow television programming. My professional background is in teaching, educational administration, rehabilitation administration and program management and marketing in a corporate environment, all of which enable me to speak with experience to the question of captioning for deaf and hard of hearing persons.

The Federal Communications Commission (FCC) proposes to amend Part 15 of its rules to adopt standards for the display of closed captions on digital television (DTV) receivers and to require the inclusion of decoder circuitry in DTV receivers. The FCC is to be commended for taking this opportunity to review current industry practices with a view to making "substantial improvements" available to consumers of captioning services.

The Electronics Industry Alliance has developed a standard (EIA-708) which, if adopted in its entirety, would deliver the "substantial improvements" envisioned in the Commission's Notice of Proposed Rule Making (NPRM). The Commission's proposed rules do not

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propose to adopt EIA-708 in full. Rather, the rules propose to adopt only the very minimal requirements in Section 9.

Failure to adopt the full features of EIA-708 is not only shortsighted but continues to allow for minimal benefit to individuals who have limited vision in addition to being deaf or hard of hearing and other such special individual requirements. Such an approach falls short of the ideal of adopting the technology to the needs of the individual but would force the individual to adapt to the constraints of a singular technological standard.

The Commission is encouraged to adopt the full EIA-708 standard as opposed to the adoption of only Section 9 which would only maintain the status quo and fail to take advantage of new digital technologies. This is inconsistent with FCC policies as stated in its new Section 255 rules wherein manufacturers are required to incorporate access as early and as consistently as possible in design stages. Additionally, adopting the full EIA-708 standard would save the industry the time and expense of later going back for retrofit.

Sizes: The current FCC caption standard does not provide the ability to adjust the size of closed captions. While the current standard does satisfy the size needs of a large number of viewers, it does not take into consideration the needs of individuals with low vision, including many senior citizens. New digital technologies (and the EIA-708 standard) enable viewers to control the size of captions while the standard proposed by the FCC contained in Section 9 only recommends one standard size of captions. The Commission is urged to adopt the full EIA-708 standard, which will allow viewers to alter the size of captions the same way the TV's sound volume is commonly adjusted to suit individual needs.

Colors: Persons with limited vision differ in their ability to see and use colors. A color that is easily seen by one person may be hardly visible to another. Section 9 would only require decoders to use solid black backgrounds. In contrast, EIA-708 as a whole would permit users to choose from a variety of foreground and background colors, so that viewers can create contrasts against various backgrounds. The proposed FCC standard as drafted is unnecessarily limiting.

Font: EIA-708, Section 9 proposes only one font. But EIA-708 in its entirety would permit viewers to choose from among 8 different fonts. The FCC should adopt a standard that offers viewers the most choices available with the new digital technologies, especially for those who need different color contrast options to see optimally.

Captioning Services: The FCC's rules currently require decoders to be capable of decoding captioning data for two (2) captioning services at the same time while most TV receivers can decode up to four (4) captioning streams. The proposed standard - Section 9 - would only require decoders to decode and process data for one captioning service. This is actually a step backward. The FCC should adopt a standard that requires digital television equipment to decode all of the standard and extended digital services (six (6) standard services and up to 57 additional extended services).

Dual Mode Receivers: The FCC's proposal to require DTV receivers to operate in a dual mode (to decode programming sent in both analog and digital formats) is important as we go through the transition from analog to digital TV.

DTV Converter Boxes and Tuners: The FCC's proposal to require DTV converter boxes and tuners to decode closed captions in either the analog or digital format should be required regardless of the size of the television to which the converter or tuner is connected.

Receivers should be so designed that for individuals who require captions, captioning becomes the default mode. Also, the captioning feature and the mute feature should not be interconnected. A family should be able to chose any combination of sound and captioning that meets the family needs and preferences. Viewers should not have to turn on mute to receive captions. Nor should viewers have to go through long menu mazes to figure out how to obtain captions as often happens in hotels and motels.

The Commission is respectfully urged to adopt the full EIA-708, a standard that is a true improvement over current captioning standards.

Respectfully submitted,

A handwritten signature in cursive script that reads "Charles C. Estes".

Charles C. Estes
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